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PUC DOCKET NO. 51415

**APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**



TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers ("TIEC"), pursuant to the Public Utility Regulatory Act ("PURA"), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC's authorized representatives are:

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Mr. Benjamin B. Hallmark
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All pleadings and other documents should be served upon TIEC's authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission.

3. On October 14, 2020, Southwestern Electric Power Company ("SWEPCO") filed an application for authority to change rates.

4. Because TIEC member companies own and operate industrial facilities in the SWEPCO service territory and purchase electricity from SWEPCO, TIEC members will be impacted by any determinations the Commission may make regarding SWEPCO's application.

For the above stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ James Z. Zhu

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**ATTORNEYS FOR TEXAS INDUSTRIAL
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CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 20th day of October, 2020 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

/s/ James Z. Zhu

James Z. Zhu